



North Carolina Department of Health and Human Services

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July 12, 2010

MEMORANDUM

TO: All Interested Parties

FROM: Leza Wainwright

SUBJECT: Summary Version of Special Implementation Update #75

Please send any input or suggestions for the Summary version to us at ContactDMH@dhhs.nc.gov. Readers who want to view the Implementation Updates and the two other summaries may find them on our website at <http://www.ncdhhs.gov/mhddsas/servicedefinitions/servdefupdates/index.htm>; refer to the detailed version as the authority to avoid confusion.

Transition Timeframe for Full Critical Access Behavioral Health Agencies Implementation

- The timeframe for implementation of Critical Access Behavioral Health Agencies (CABHA) has been extended to occur between July 1, 2010 and December 31, 2010.
- This transition period will enable Critical Access Behavioral Health Agencies who have been certified, enrolled, and endorsed for the specific service, to begin providing Intensive In-Home Services (IIH), Community Support Team (CST), and Child and Adolescent Day Treatment effective July 1, 2010.
- This will also allow current endorsed and enrolled providers of these services to continue to provide services between July 1, 2010 and December 31, 2010, if necessary, to either complete the certification process to become a CABHA or to transition consumers to a Critical Access Behavioral Health Agency.
- Over the next several months, as Critical Access Behavioral Health Agencies complete the certification and enrollment process, DHHS will be working with local management entities (LMEs) and providers to transition consumers to certified Critical Access Behavioral Health Agencies.

Revised CABHA Letter of Attestation Submission Process

- The Department of Health and Human Services has received approximately 600 CABHA Letters of Attestation and over 200 resubmissions.
- In order to respond in a timely manner and best utilize our limited resources, we have developed a submission protocol for Critical Access Behavioral Health Agency Letters of Attestation. Please refer to the Critical Access Behavioral Health Agency website for submission requirements at: <http://www.ncdhhs.gov/mhddsas/cabha/index.htm>.

Update on Subcontracting between a Critical Access Behavioral Health Agency and another Provider Agency

- The Centers for Medicare and Medicaid Services (CMS) has clarified that a Critical Access Behavioral Health Agency may not subcontract with another agency for the provision of services to meet Critical Access Behavioral Health Agency requirements for required services.

- Critical Access Behavioral Health Agencies may, however, secure the services of individual practitioners through employment of the individual or as an independent contractor.

Extension of Case Management Services under Community Support Services

- The end date for case management services under Community Support Services has been extended to allow recipients to access case management services under Child and Adult Community Support Services until the Mental Health and Substance Abuse Case Management State Plan Amendment has been approved.
- Community Support Services may be provided only for case management functions for up to 4 hours monthly for adults and children, though services for individuals under 21 are subject to Early and Periodic Screening, Diagnostic, and Treatment (EPDST) provisions.
- Please see Implementation Updates #65 and #68 for information on providing the case management functions of Community Support.

Update on Community Support Team, Intensive In-Home and Child and Adolescent Day Treatment Training Requirements

- The new training requirements for these services will not go into effect until January 2011.
- This will allow Critical Access Behavioral Health Agencies to plan, develop and implement a training process for new and existing staff per the clinical coverage policy requirements. It will also allow Critical Access Behavioral Health Agency training directors the option to develop train-the-trainer resources within their Access Behavioral Health Agency in order to promote the delivery of high quality, cost effective training.
- We gratefully acknowledge that many providers in the system have been proactive and have completed training requirements in the revised policies. This has been made possible by trainers and other stakeholders who have rapidly put appropriate trainings in place to meet the requirements.
- At this time, there is no intent to revise the training requirements; therefore, we encourage providers and trainers to continue with their current training plans.
- Any training that meets the revised policy requirements set forth in Implementation Update #73 will meet the criteria for training for Community Support Team and Intensive In-Home services in January 2011.

The minimum training requirements in effect until January 2011 for Community Support Team and Intensive In-Home can be reviewed in the full version of Special Implementation Update #75.

Community Support Team Service Revised Rate and Effective Date

The effective date for the following rate decrease is July 1, 2010.

Service Code	Service Description	Service Unit	Current Rate	New Rate
H2015 HT	Community Support Team	per 15 min unit	\$ 15.60	\$ 14.50

Fee schedules are available on the Division of Medical Assistance (DMA) website at <http://www.ncdhhs.gov/dma/fee/>. Providers must always bill their usual and customary charges.

Community Support Team Revised Authorization Limit and Effective Date

- Effective August 1, 2010, all new authorizations for Community Support Team shall be based upon medical necessity as defined by Division of Medical Assistance Clinical Coverage Policy 8A and shall not exceed 32 hours (128 units) per 60-day period.
- Effective August 1, 2010, requests received by ValueOptions for more than 32 hours per 60-day period shall be returned as “Unable to Process.” Existing authorizations for Community Support Team will remain effective until the end of the current authorization period.

Unless noted otherwise, please email any questions related to this Implementation Update to ContactDMH@dhhs.nc.gov.